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Department of Energy

ALBUQUERQUE OPERATIONS
ROCKY FLATS AREA OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

FILE: NUC/LLM
Permit App - 11/28/86

OCT 31 1986

HAND-DELIVERED

✓ Mr. Kenneth Maesche, Director
Waste Management Division
Colorado Department of Health
4210 E. 11th Avenue
Denver, CO 80220

RECEIVED

Mr. Robert L. Duprey, Director
Waste Management Division
Environmental Protection Agency, Region VIII, 8 HMM
One Denver Place
999 18th Street
Denver, CO 80202-2413

Gentlemen:

Enclosed is the draft of the Rocky Flats Plant (RFP) RCRA Part B Permit Application for your review as required by the July 31, 1986 Compliance Agreement. A listing of all documents included in this submittal follows below. As part of your review of the draft Permit Application, we request your confirmation as to the correct EPA Facility Identification Number for RFP.

The documents included in this submittal are:

I. Rocky Flats Plant RCRA Part B Permit Application

Section A	Interim Status
Section B	Facility Description
Section C	Waste Characteristics and Waste Analysis Plan
Section D	Process Information
Section E	Groundwater Monitoring & Protection, Vols 1-11
Section F	Procedures to Prevent Hazards
Section G	Contingency Plan
Section H	Personnel Training
Section I	Closure Plan
Section J	Other Federal Laws
Appendix 1	Vol 1-3, RCRA 3004(u), Waste Management Units
Appendix D	Hazardous Waste Minimization Plan
Appendix F	Safety & Emergency Equipment Inspection Sheets
Appendix G	Satellite Collection & 90 Day Collection Areas

II. Part B Post-Closure Care Permit Application, Interim Status Facilities, Vol 1-2

ADMIN RECORD

SW-A-005575

We would like to bring to your attention the following subjects:

- 1) Because the present landfill (not to include those sections that will continue to operate under Colorado Solid Waste Disposal Regulations), solar evaporation ponds, and west spray field are being closed under RCRA Interim Status requirements, no RCRA operating permit for land disposal units has been requested in the draft permit application. Therefore, no Groundwater Protection Section (Section E) is required in the operating permit application under RCRA regulations. However, a groundwater protection section addressing the relevant RCRA regulations for closure of the solar ponds, present landfill and west spray field is provided in the Post-Closure Care Permit application. [The section will be reorganized and will include all groundwater information before the draft is finalized on November 28, 1986, to better facilitate a regulatory compliance review.] In addition, a Groundwater Monitoring and Protection section has been submitted as part of the RCRA Part B Permit Application in accordance with Tasks 3.5 and 3.6 of the Compliance Agreement. The section focuses on the geological and hydrological site characterization as described in the draft Work Plan submitted to CDH and EPA on July 21, 1986.
- 2) The Part B Permit Application contains a comprehensive schedule for Remedial Investigations and Feasibility Studies (RI/FS) for all potential Solid Waste Management Units (SWMU) and CERCLA areas in accordance with Task 3.4 of the Compliance Agreement. However, it may not be necessary to actually perform an RI/FS on every unit. Under RCRA, the EPA will evaluate the likelihood of a release from a SWMU based on the information provided in Appendix 1 of the Permit application and a Preliminary Assessment/Site Investigation (PA/SI). Based on that information, the EPA will then determine whether an RI/FS is necessary. Since PA/SI studies have already been performed for many of the SWMU and CERCLA sites at RFP as part of DOE's Comprehensive Environmental Assessment and Response Program (CEARP), we hope to discuss with you what the next step should be for each of the SWMU and CERCLA sites at RFP.
- 3) It is assumed that the Sewage Treatment Plant will continue to operate under the NPDES Permit, but it is expected that the Plant may be inspected by RCRA inspectors.
- 4) Appendix 1 (one) has a list of all the waste units at RFP, plus categories that identify which units are SWMU, CERCLA units, TRU units, Closure units, or units to be permitted. The main body of the Permit Application includes clarifying information on units seeking a Permit.

Mr. Kenneth Maesche
and Mr. Robert L. Duprey

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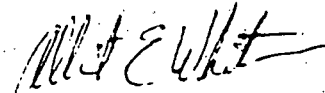
- 5) The engineering drawings for each unit to be permitted are not included in this draft. Those drawings will be included in the final Permit Application.
- 6) All sections of the draft permit applications are based on current information. Substantial revisions to the draft are anticipated prior to the final submittal on November 28, 1986.
- 7) Section K (Certification of the Operating Permit Application) will be submitted to CDH and EPA as part of the Final Permit Application to be submitted November 28, 1986.

Please note that the submittal is marked to indicate that it may contain information subject to Section 148 of the Atomic Energy Act. This may be removed at a later date.

We would appreciate your review of the draft Permit Application during the next two weeks. We are planning to schedule a meeting on November 12 or 13, so that we may obtain your preliminary comments to allow us to prepare a final Permit application for delivery to you by November 28, 1986.

If you have any questions, please contact me or John Whitsett.

Sincerely,



Albert E. Whiteman
Area Manager

Enclosures